

EXHIBIT 1

Akiva Cohen

From: Alamuddin, Sari M. <sari.alamuddin@morganlewis.com>
Sent: Thursday, June 8, 2023 9:44 PM
To: Akiva Cohen; Angus Blake; Dylan Schmeyer; Mike Dunford; Berry, Brian D.; Meckley, Eric; Wallace, Thomas Cullen; Cherry, Ashlee N.; Stephenson, Kassia; Lotsoff, Jonathan D.; Chowdhry, Kaiser H.; Lipsky, Megan L.; Haimann, Ph.D., Clifford
Cc: Doyle, Adele; Meyer, Cait; allen.owen@morganlewis.com
Subject: RE: Szajnberg, Vanessa vs. Twitter, Inc. et al. - JAMS Ref No. 1601002340

Akiva:

Our position is clear and has always been that California CCP 1281.97 does not apply to persons outside of California. We are not (and have never) argued that CCP 1281.97 applies outside of California. Rather, we have simply ensured that, in all other states, payment is made within 30 days of receipt, which is a reasonable position and, to the extent you win your argument that California CCP 1281.97 applies nationwide, ensures compliance with that rule.

If you have any authority under NY law that delineates an earlier NY deadline, please provide it.

Thanks.

Sari M. Alamuddin

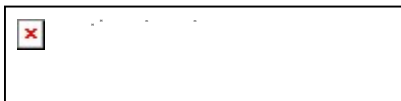
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From: Akiva Cohen <acohen@kuskulaw.com>

Sent: Thursday, June 8, 2023 12:56 PM

To: Angus Blake <ABlake@jamsadr.com>; Dylan Schmeyer <dschmeyer@kuskulaw.com>; Mike Dunford <mdunford@kuskulaw.com>; Berry, Brian D. <brian.berry@morganlewis.com>; Meckley, Eric <eric.meckley@morganlewis.com>; Wallace, Thomas Cullen <cullen.wallace@morganlewis.com>; Cherry, Ashlee N. <ashlee.cherry@morganlewis.com>; Stephenson, Kassia <kassia.stephenson@morganlewis.com>; Lotsoff, Jonathan D. <jonathan.lotsoff@morganlewis.com>; Alamuddin, Sari M. <sari.alamuddin@morganlewis.com>; Chowdhry, Kaiser H. <kaiser.chowdhry@morganlewis.com>; Lipsky, Megan L. <megan.lipsky@morganlewis.com>; Haimann, Ph.D., Clifford <clifford.haimann@morganlewis.com>

Cc: Doyle, Adele <adele.doyle@morganlewis.com>; Meyer, Cait <cait.meyer@morganlewis.com>;

allen.owen@morganlewis.com

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[EXTERNAL EMAIL]

Sari and team,

I will just note that Vanessa is a New York-based employee and you are **currently** arguing to a federal district court that California Code of Civ. Proc. 1281.97, which is the authority you had previously given for delaying all payments until 30 days past the invoice, applies only to California-based employees.

Obviously, we believe it applies to all employees. But if you are taking the position here that you are entitled to delay paying this fee until late June based on Section 1281.97, you have an ethical obligation to inform the NDCal as much. And if you are not, then what is the basis on which you continue to delay this arbitration?

Please advise.

Best,

Akiva

Sent from my T-Mobile 5G Device

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From: Angus Blake <ABlake@jamsadr.com>

Sent: Thursday, June 8, 2023 1:37:04 PM

To: Akiva Cohen <acohen@kusklaw.com>; Dylan Schmeyer <dschmeyer@kusklaw.com>; Mike Dunford <mdunford@kusklaw.com>; brian.berry@morganlewis.com <brian.berry@morganlewis.com>; eric.meckley@morganlewis.com <eric.meckley@morganlewis.com>; cullen.wallace@morganlewis.com <cullen.wallace@morganlewis.com>; ashlee.cherry@morganlewis.com <ashlee.cherry@morganlewis.com>; kassia.stephenson@morganlewis.com <kassia.stephenson@morganlewis.com>; jonathan.lotsoff@morganlewis.com <jonathan.lotsoff@morganlewis.com>; sari.alamuddin@morganlewis.com <sari.alamuddin@morganlewis.com>; kaiser.chowdhry@morganlewis.com <kaiser.chowdhry@morganlewis.com>; megan.lipsky@morganlewis.com <megan.lipsky@morganlewis.com>; clifford.haimann@morganlewis.com <clifford.haimann@morganlewis.com>

Cc: adele.doyle@morganlewis.com <adele.doyle@morganlewis.com>; cait.meyer@morganlewis.com <cait.meyer@morganlewis.com>; allen.owen@morganlewis.com <allen.owen@morganlewis.com>

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Counsel,

Following up for payment of the initial retainer by Respondent here. Once the attached is paid, I will reach out to schedule a preliminary call with the arbitrator.

Best,

-Angus



Angus Blake
Case Manager

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From: Sarah Nevins <snevins@jamsadr.com>

Sent: Thursday, May 25, 2023 12:59 PM

To: acohen@kusklaw.com; dschmeyer@kusklaw.com; mdunford@kusklaw.com; brian.berry@morganlewis.com; eric.meckley@morganlewis.com; cullen.wallace@morganlewis.com; ashlee.cherry@morganlewis.com;

kassia.stephenson@morganlewis.com; jonathan.lotsoff@morganlewis.com; sari.alamuddin@morganlewis.com;

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Cc: adele.doyle@morganlewis.com; cait.meyer@morganlewis.com; allen.owen@morganlewis.com; Angus Blake <ABlake@jamsadr.com>

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Counsel,

I have just uploaded the appointment and disclosure documents to JAMS Access regarding the above referenced matter. Please note that your new case manager on this file is Angus Blake. Angus has been cc'd on this email. Kindly update your records accordingly.

Thank you,
Sarah



Sarah Nevins
Arbitration Practice Manager – East/Central

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